
Defense Energy Support Center
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Track Environmental/Facilities

Spill Prevention



Presentation Outline/Format

- Spill Prevention Update
 - Josh Dickinson, Petroleum Partners
- Readiness when Prevention Fails
 - Cindy Smith, DESC-WQ
- Panel Discussion



Oil Spill Prevention

Spill Prevention, Control and Countermeasure (SPCC) Plans



HISTORICAL PERSPECTIVE

- Dec 1973 - Prevention requirements of 112.1 - 112.7
- 1991, 1993 and 1997 - EPA proposed revisions
- July 17, 2002 - Final Revised SPCC Rule published
- Aug 17, 2002 - Revised SPCC Rule Effective
- Feb 17, 2006 - Plan review / amendments required
- Aug 18, 2006 - Implementation required



GENERAL APPLICABILITY -112.1(a)

- General Requirements
 - Establishes procedures, methods, equipment, and other requirements to prevent discharge of oil
 - Requirement extends to discharges into or upon:
 - US navigable waters
 - Adjoining shorelines
 - Waters of the contiguous zone
 - In connection with activities that may affect US natural resources



GENERAL APPLICABILITY – EXEMPTIONS

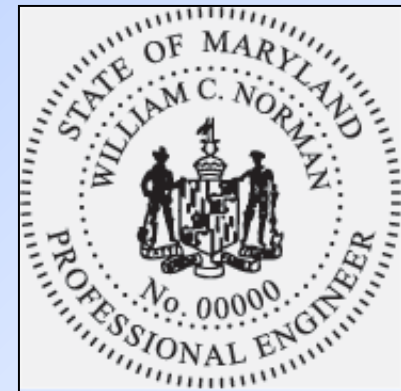
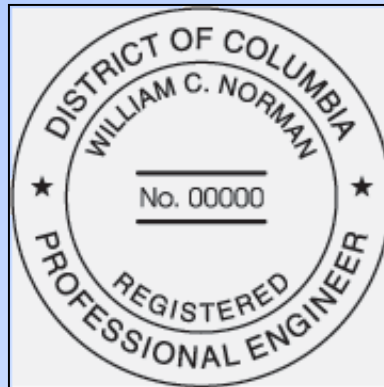
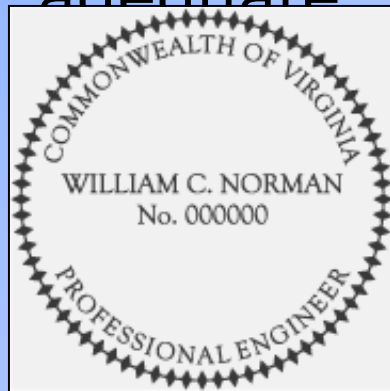
– 112.1(d)(2)

- Facilities w/completely buried storage capacity \leq 42,000 gal
 - Does not include completely buried tanks subject to 40 CFR 280 or 281
- Facilities with aboveground storage capacity \leq 1,320 gallons
- Only containers of oil with a capacity of \geq 55 gallons are counted threshold



P.E. Certification – 112.3

- PE or agent has visited and examined the facility, good engineering practice includes consideration of applicable industry standards and requirements of 40 CFR 112, inspections and testing procedures established, Plan is adequate



AMENDMENT OF SPCC BY OWNERS OR OPERATORS – 112.5

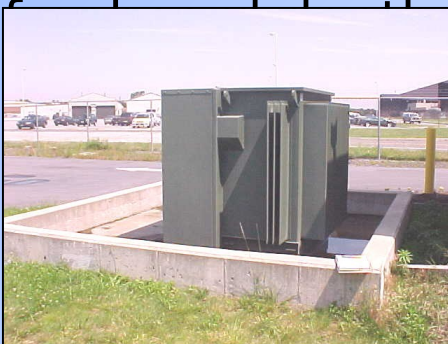
- Requirements

- Amend Plan within 6 months of change in design, O or M, construction that materially affects potential for discharge, or increase/decrease in storage capacity
- Review/evaluate Plan 5 years since last review
- P.E. certifies technical amendment(s)



SECONDARY CONTAINMENT – 112.7(c), 112.8(c)(2), 112.8(c)(11)

- Must provide containment/diversionary structure for the volume of the largest container plus precipitation
 - Includes tanks and piping
 - Mobile/portable storage containers
 - Oil-filled electrical equipment
 - Capable of containing spills until cleaned up
- Impacts
 - EPA recommends 72 hour permeability and containment for 25-yr, 24-hr storm event



TANK CAR/TRUCK L/UL RACK – 112.7(h)

- Requirements
 - Secondary containment capable of max capacity of single compartment if diversion system not used
 - EPA guidance states that this section only applies to “racks,” although L/UL ops still subject to 40 CFR 112.7(c)



FACILITY DRAINAGE – 112.8(b)

- Requirements
 - Design facility drainage systems from undiked areas to flow into ponds, lagoons, or catchment basins (not subject to flooding)
 - Otherwise equip facility with diversion system to retain oil
 - Includes piping located outside secondary containment outside the loading area



INTEGRITY TESTING – 112.8(c)(6)

- Requirements

- Test for integrity on a regular schedule (or during material repairs)
- Must combine visual inspection with a non-destructive testing technique
- EPA ruling for EEP and exemption from 112.8(c)(6): For well-designed containers < 30,000 gal, combine appropriate visual inspection with:
 - Elevation of tank and all sides visible
 - Placement of barrier between tank and ground that allows for immediate detection of a leaking container).



Case Studies – Be Alert!!!



Case Studies – Be Alert!!!

- ASTs and Secondary Containment



Case Studies – Be Alert!!!

- Piping



Case Studies – Be Alert!!!

- Mobile Storage and L/UL Racks



Case Studies – Be Alert!!!

- Drainage

